

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

ANNIE WOODALL,

Plaintiff,

v.

AMERICAN INTERNATIONAL GROUP, INC.;  
et al.,

Defendants.

CIVIL ACTION NO.  
3:06-cv-00050-MEF

COUNTY OF CHEROKEE

STATE OF GEORGIA

**AFFIDAVIT OF ROBERT S. RITTER**

Robert S. Ritter, under oath, states as follows:

1. My name is Robert S. Ritter. The statements made in this declaration are based upon my own personal knowledge as more specifically set forth below and, if sworn as a witness, I could testify competently to them.

2. I serve as Director of Operations for the State of Alabama and am an officer of American General Financial Services, Inc. ("American General"). Attached hereto as Exhibit 1 are true and correct copies of documents reflecting loan transactions between Plaintiff Annie Woodall and American General, which were created and executed at the time of the loan transactions with Annie Woodall. They have been maintained in the course of American General's regularly conducted business activity since those transactions, and it is the regular practice of American General to maintain such records.

3. Kathie Rowell, an individual defendant in the above-styled matter, has not been employed by American General since April of 2000.



4. Tina Cook, an individual defendant in the above-styled matter, has not been employed by American General since January of 1999.

5. Linda Griggs, an individual defendant in the above-styled matter, has not been employed by American General since August of 1997.

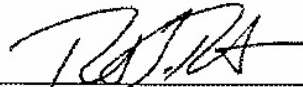
6. Ken Hamill, an individual defendant in the above-styled matter, has not been employed by American General since December of 1998.

7. Brian Miller, an individual defendant in the above-styled matter, has not been employed by American General since September of 2000.

8. In fact, none of the individuals employed at American General's Auburn branch at the time of Annie Woodall's loans in 1993, 1995, and 1997 are still employed there today.

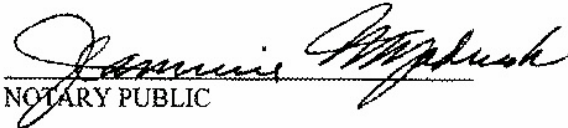
**FURTHER AFFIANT SAYETH NOT.**

This the 23rd day of February, 2006.



Robert S. Ritter

SWORN TO AND SUBSCRIBED BEFORE ME, this the 23rd day of February,  
2006.

  
NOTARY PUBLIC

My Commission Expires:

My Commission Expires August 11 2008

